

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

RIGOBERTO RAMIREZ,

Criminal No. *19cr10072*

Violations:

Counts One and Two: Interfering with
Commerce by Threats or Violence;
Aiding and Abetting
(18 U.S.C. §§ 1951 and 2)

Forfeiture Allegation:
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C.
§ 2461(c))

INDICTMENT

COUNT ONE

Interfering with Commerce by Threats or Violence; Aiding and Abetting
(18 U.S.C. §§ 1951 and 2)

The Grand Jury charges:

On or about January 17, 2018, at Malden, in the District of Massachusetts, the defendant,

RIGOBERTO RAMIREZ,

did, in any way and degree, obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did attempt to do so, in that defendant did unlawfully take and obtain personal property belonging to, and in the custody and possession of Charles Street Convenience store, and did unlawfully take and obtain said personal property from the person and in the presence of another, an employee of Charles Street Convenience store, against his will, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to his person and

property and property in his custody and possession.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT TWO

Interfering with Commerce by Threats or Violence; Aiding and Abetting
(18 U.S.C. §§ 1951 and 2)

The Grand Jury further charges:

On or about January 17, 2018, at Everett, in the District of Massachusetts, the defendant,

RIGOBERTO RAMIREZ,

did, in any way and degree, obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did attempt to do so, in that defendant did unlawfully take and obtain personal property belonging to, and in the custody and possession of the Posada Convenience Store, and did unlawfully take and obtain said personal property from the person and in the presence of another, an employee of the Posada Convenience Store, against her will, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to her person and property and property in her custody and possession.

All in violation of Title 18, United States Code, Sections 1951 and 2.

ROBBERY FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1951 and 2, set forth in Counts One and Two of this Indictment, the defendant,

RIGOBERTO RAMIREZ,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL



FOREPERSON OF THE GRAND JURY



ROBERT E. RICHARDSON
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

DISTRICT OF MASSACHUSETTS; FEBRUARY 20 2019
Returned into the District Court by the Grand Jurors and filed.



DEPUTY CLERK
2:32 p.